

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAUL VANDERHEIDEN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., ROBERT J.
PERA, KEVIN RADIGAN, CRAIG L. FOSTER
and MARK SPRAGG,

Defendants.

No.: 1:18-cv-01620

**DECLARATION OF JEREMY A.
LIEBERMAN IN SUPPORT OF
MOTION OF XIYA QIAN FOR
CONSOLIDATION,
APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
COUNSEL**

XIYA QIAN, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., ROBERT J.
PERA, KEVIN RADIGAN, CRAIG L. FOSTER
AND MARK SPRAGG,

Defendants.

No.: 1:18-cv-01841

JOHN KHO, Individually and on Behalf Of All
Others Similarly Situated,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., ROBERT J.
PERA AND KEVIN RADIGAN,

Defendants.

No.: 1:18-cv-02242

I, Jeremy A. Lieberman, hereby declare as follows:

1. I am an attorney with the law firm of Pomerantz LLP (“Pomerantz”), counsel on behalf of Xiya Qian (“Qian”) and have personal knowledge of the facts set forth herein. I make this Declaration in support of Qian’s motion for consolidation of the above-captioned related

actions, appointment as Lead Plaintiff for the Class, and approval of Qian's selection of Pomerantz as Lead Counsel for the Class.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

Exhibit A: Press release published over *PR Newswire* on February 22, 2018, announcing the pendency of the first of the above-captioned related actions to be filed;

Exhibit B: Shareholder Certification executed by Qian;

Exhibit C: Loss Chart of Qian; and

Exhibit D: Firm resume of Pomerantz;

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on April 23, 2018, at New York, New York.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman